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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
(SAN FRANCISCO DIVISION)

CHARLES GILCHRIST AND MATTHEW B. HALLINAN, in their capacities as Trustees of APARTMENT EMPLOYEES PENSION TRUST FUND, and APARTMENT EMPLOYEES WELFARE FUND,) No. CV 07-5803-CRB
)
)
) PLAINTIFFS' CASE MANAGEMENT STATEMENT
)
Plaintiffs,) DATE: March 7, 2008
) TIME: 8:30 a.m.
v.) COURTRM: 9, 19 TH Floor
)
PROFESSIONAL TECHNICAL SECURITY SERVICES, INC. (PROTECH), a Delaware Corporation,)
)
Defendant.)

Plaintiffs, through counsel, hereby submit the following statement:

I. STATUS OF THE CASE


Plaintiffs Charles Gilchrist and Matthew B. Hallinan, in their capacities as Trustees Of Apartment Employees Pension Trust Fund, and Apartment Employees Welfare Fund ("Plaintiffs") filed the above-referenced case on November 15, 2007. *See* Docket No. 1. Defendant was timely served with the complaint on November 26, 2007, but failed to answer the complaint. *See* Docket No. 3. On January 24, 2008, Plaintiffs requested Entry of Default against Defendant. *See* Docket

No. 4. Defendant was served with this request. Id. The Clerk entered default against Defendant on February 6, 2008. *See* Docket No. 5. On February 20, 2008, Plaintiffs filed their Notice Of Motion And Motion For Default Judgment; Memorandum Of Points And Authorities In Support Of Motion For Default Judgment, and supporting Declarations. *See* Docket Nos. 8, 9, 10, 11, 12, and 13. This matter is scheduled to be heard on April 4, 2008 at 10:00 a.m. before the Honorable Charles R. Breyer.

In light of Plaintiffs' Motion for Default Judgment scheduled to be heard on April 4, 2008, Plaintiffs hereby request that the Court continue the Case Management Conference for sixty (60) days.

Dated: February 28, 2008

WEINBERG, ROGER & ROSENFELD
A Professional Corporation

By: 
CHRISTIAN L. RAISNER
ANDREA LAIACONA
LINELLE S. MOGADO
Attorneys for Plaintiffs

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PROOF OF SERVICE

I am a citizen of the United States, and a resident of the State of California. I am over the age of eighteen years, and not a party to the within action. My business address is 1001 Marina Village Parkway, Suite 200, Alameda, California 94501-1091. On February 28, 2008, I served upon the following parties in this action:

Professional Technical Security Services, Inc.
Attn: Sergio Reyes, Jr. – Agent for Service of Process
625 Market Street, 9th Floor
San Francisco, CA 94105

copies of the document(s) described as:

PLAINTIFFS' CASE MANAGEMENT STATEMENT

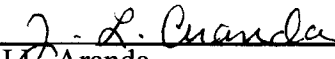
☒ **BY MAIL** I placed a true copy of each document listed herein in a sealed envelope, addressed as indicated herein, and caused each such envelope, with postage thereon fully prepaid, to be placed in the United States mail at Alameda, California. I am readily familiar with the practice of Weinberg, Roger & Rosenfeld for collection and processing of correspondence for mailing, said practice being that in the ordinary course of business, mail is deposited in the United States Postal Service the same day as it is placed for collection.

☐ **BY PERSONAL SERVICE** I placed a true copy of each document listed herein in a sealed envelope, addressed as indicated herein, and caused the same to be delivered by hand to the offices of each addressee.

☐ **BY OVERNIGHT DELIVERY SERVICE** I placed a true copy of each document listed herein in a sealed envelope, addressed as indicated herein, and placed the same for collection by Overnight Delivery Service by following the ordinary business practices of Weinberg, Roger & Rosenfeld, Alameda, California. I am readily familiar with the practice of Weinberg, Roger & Rosenfeld for collection and processing of Overnight Delivery Service correspondence, said practice being that in the ordinary course of business, Overnight Delivery Service correspondence is deposited at the Overnight Delivery Service offices for next day delivery the same day as Overnight Delivery Service correspondence is placed for collection.

☐ **BY FACSIMILE** I caused to be transmitted each document listed herein via the fax number(s) listed above or on the attached service list.

I certify that the above is true and correct. Executed at Alameda, California, on February 28, 2008.


J.L. Aranda